

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KARL CINA,

Plaintiff,

v.

PUERTO RICAN FAMILY INSTITUTE, INC.,  
and HOPE FOR FAMILIES AND CHILDREN  
FOUNDATION, INC.,

Defendants.  
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Case No. 12-cv-2276 (KBF)

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ECF Case

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**NOTICE OF MOTION TO**

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**DISMISS PURSUANT TO**

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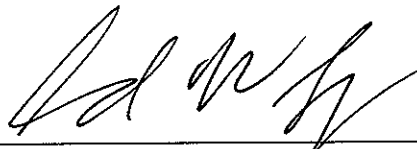
**FED. R. CIV. P. 12(b)(6)**

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**PLEASE TAKE NOTICE** that upon the annexed Memorandum of Law in Support of Defendants' Motion to Dismiss the Second Amended Complaint, the Declaration of Andrew W. Singer, sworn to on August 2, 2012, and the exhibits attached thereto, upon the Second Amended Complaint herein, Defendants the Puerto Rican Family Institute, Inc. and the Hope for Families and Children Foundation, Inc. will move this Court before the Honorable Katherine B. Forrest, United States Courthouse for the Southern District of New York in Courtroom 15A, at 500 Pearl Street, New York, New York 10007-1312, at a date and time to be determined by the Court, for an order (i) granting Defendants' Motion to Dismiss Plaintiff's Second Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) on the grounds that Plaintiff's allegations fail to state a claim for which relief may be granted; and (ii) for such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
August 2, 2012

TANNENBAUM HELPERN  
SYRACUSE & HIRSCHTRITT LLP

A handwritten signature in black ink, appearing to read 'Andrew W. Singer', is written over a horizontal line.

By: Andrew W. Singer  
Jason B. Klimpl

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*Attorneys for Defendants*